

1 GALINA KLETSER JAKOBSON (SBN 191227)  
gjakobson@selmanbreitman.com  
2 ERNEST D. FAITOS (SBN 119141)  
efaitos@selmanbreitman.com  
3 SELMAN BREITMAN LLP  
33 New Montgomery, Sixth Floor  
4 San Francisco, CA 94105-4537  
Telephone: 415.979.0400  
5 Facsimile: 415.979.2099

6 Attorneys for Plaintiff TITAN INDEMNITY COMPANY,  
7 A Texas Corporation

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

TITAN INDEMNITY COMPANY, a Texas corporation.

Plaintiff,

V.

A PLUS TOWING, a General Partnership;  
JOSE HERMOSILLO, individually and dba A  
PLUS TOWING; FERNANDO  
HERMOSILLO, individually and dba A PLUS  
TOWING; A PLUS TOWING, a business  
organization form unknown, and KATRINA  
RAPP, an individual, and DOES 1-10,

Defendants.

Case No. 3:14-cv-03864-WHA

STIPULATION BETWEEN PLAINTIFF  
TITAN INDEMNITY COMPANY AND  
DEFENDANT KATRINA RAPP  
REGARDING COORDINATION OF  
DEPOSITIONS, AND [PROPOSED] ORDER

IT IS HEREBY STIPULATED by and between plaintiff Titan Indemnity Company, by and through its attorney of record, Galina Kletser Jakobson, Esq. of Selman Breitman LLP, and defendant Katrina Rapp, by and through her attorney of record, Martin T. Reilley, Esq. of Krankemann Law Offices, pursuant to Federal Rules of Civil Procedure, Rule 29 authorizing the parties to stipulate to modify procedures regarding discovery, except in the extension of deadlines, and in the interest of maximizing efficiency, and reducing the time and costs necessary to complete discovery in this action:

1       1. That the depositions of Jose Hermosillo, Sr., Jose Hermosillo, Jr., Fernando  
2 Hermosillo, Eugene Roberson, and Katrina Rapp may be taken simultaneously with, and in  
3 conjunction with the depositions of the same individuals in the State Court action of *Katrina*  
4 *Rapp v. A Plus Towing, et al.*, Superior Court of California, County of Sonoma, Case No.  
5 255299. The stipulating parties agree that the aforementioned five depositions shall be taken  
6 pursuant the California Code of Civil Procedure provisions that govern before whom depositions  
7 may be taken, the time and place of depositions, and the notice and manner of depositions.

8       2. The stipulating parties agree that the aforementioned five depositions may be used  
9 for all pretrial and trial-related purposes in this, the above entitled federal court action, without  
10 objection by any party based on the fact that the depositions were taken pursuant to the  
11 California Code of Civil Procedure.

12       3. The stipulating parties preserve all other objections and rights pursuant to the  
13 Federal Rules of Civil Procedure, the Federal Rules of Evidence, the California Code of Civil  
14 Procedure, and the California Rules of Evidence to the use of these depositions at trial based on  
15 relevance and privilege.

16  
17 DATED: December 30, 2014

SELMAN BREITMAN LLP

18  
19 By:  
20



21 GALINA K. JAKOBSON  
ERNEST D. FAITOS  
Attorneys for Defendant Katrina Rapp

22  
23  
24  
25  
26  
27  
28

1 DATED: December 30, 2014

2 KRANKEMANN LAW OFFICES

3 By:

4   
MARTIN T. REILLEY

5 Attorneys for Defendant Katrina Rapp

6

7

8 **ORDER**

9 Upon Stipulation of the parties and good cause appearing therefore,

10 IT IS SO ORDERED.

11 DATED: December 31, 2014.

12 By:

13   
William Alsup  
United States District Judge

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

Selman Breitman LLP  
ATTORNEYS AT LAW